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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 JOHN ENOS, an individual,

9 Plaintiff,

10 vs.

11 DOUGLAS COUNTY, a political subdivision
12 of the State of Nevada; SCOTT SHICK, Chief
13 Juvenile Probation Officer of the Juvenile
Probation Department; THE STATE OF
14 NEVADA *ex rel.* The Ninth Judicial District
Court of the State of Nevada; DOE
15 GOVERNMENTAL ENTITIES 1-10, DOE
BUSINESS ENTITIES 1-10; and DOE
INDIVIDUALS 1-50.

16 Defendants.

17 CASE NO: 3:17-cv-00095-MMD-VPC

18 **STIPULATION AND PROPOSED ORDER
FOR ENLARGEMENT OF TIME**

19 **For Plaintiff to File Opposition
To Defendant State of Nevada's
Motion to Dismiss (ECF 005)**

20 **(Second Request)**

21 The parties to this action, by and through their undersigned counsel of record hereby stipulate
22 that Plaintiff may have a three (3)-day extension of time, through and including Friday, June 9,
23 2017, to file his opposition to *Defendant State of Nevada's Motion to Dismiss* (ECF 005). This is the
24 second request for such an extension. The current deadline to file this opposition is Tuesday, June 6,
25 2017. The reason Plaintiff needs additional time to file this brief is because his counsel has had a very
26 congested calendar, his counsel's office was closed on Memorial Day, and his counsel's legal work for
a wrongful-death litigation that has taken longer than his counsel originally anticipated when requesting
the first extension of this filing deadline. Accordingly, Plaintiff will need a few days' additional time to
file the opposition brief.

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1 This Stipulation is not offered for any dilatory or improper purpose.
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3 Dated this 1st day of June 2017.

4 ADAM PAUL LAXALT
5 Attorney General

6 *Electronic Signature Authorized*

7 Steve Shevorski

8 By: /s/
9 STEVE SHEVORSKI
10 Nevada Bar No. 8256
11 Head of Complex Litigation
12 MICHELLE DI SILVESTRO ALANIS
13 Nevada Bar No. 10024
14 Deputy Attorney General
15 State of Nevada
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18 Las Vegas, NV 89101-1068
19 (702) 486-3268 (phone)
20 *Attorneys for State of Nevada*
21 *ex rel. Ninth Judicial District Court*
22 *of the State of Nevada*

Dated this 1st day of June 2017.

THE GEDDES LAW FIRM, P.C.

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(775) 853-9455
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ORDER

16 THE COURT, having considered the preceding *Stipulation* and GOOD CAUSE appearing
17 therefor, GRANTS the *Stipulation*. IT IS HEREBY ORDERED that Plaintiff shall have additional
18 time, **through and including Tuesday, June 9, 2017**, to file his opposition to *Defendant State of*
19 *Nevada's Motion to Dismiss* (ECF 005).
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21 Dated: June 1, 2017

22 IT IS SO ORDERED

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UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on June 1, 2017, I caused to be served a copy of the foregoing *Stipulation and Proposed Order for Enlargement of Time for Plaintiff to File Opposition to Defendant State of Nevada's Motion to Dismiss (ECF 005)(Second Request)*, by electronic filing with the Court's Pacer e-filing system, addressed to:

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Attorney General
Steve Shevorski
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Head Of Complex Litigation
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